EXHIBIT F

COMPLIANCE MONITORING PLAN
GATX TERMINALS CORPORATION
HARBOR ISLAND TERMINAL
SEATTLE, WASHINGTON

ISSUED TO:

WASHINGTON STATE DEPARTMENT OF ECOLOGY

SUBMITTED BY:

GATX TERMINALS CORPORATION

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PREPARED BY:

KHM ENVIRONMENTAL MANAGEMENT, INC.
16771 NE 80th Street, Suite 203
REDMOND, WASHINGTON 98052

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10 Introduction

This Compliance Monitoring Plan has been prepared to describe the protocol and procedures that will be used to confirm that cleanup requirements have been achieved at the GATX Harbor Island Terminal (Terminal) located in Seattle, Washington. The monitoring plan has been prepared to satisfy the requirements of the Model Toxics Control Act (MTCA) regulations WAC 173-340-410, -720, and -820. This plan was also prepared in accordance with requirements of the Consent Decree, cooperatively entered into between GATX Terminals Corporation (GATX) and the Washington State Department of Ecology (Ecology).

A variety of components included in this compliance monitoring plan address the requirements of WAC 173-340-410. These components include:

1) Introduction: Discuss site overview, hydrogeology, cleanup action summary, monitoring objectives and rationale, types of monitoring, monitoring locations, and schedule;

2) Protection Monitoring: Describe the criteria for protection monitoring under WAC 173-340-400;

3) Performance Monitoring: Describe the criteria and methodology for performance monitoring of free product recovery, natural attenuation, and other selected remedial technologies to document that the cleanup action is performing as anticipated;

4) Confirmation Monitoring: Describe the confirmation criteria which monitors the long-term effectiveness of the cleanup action once cleanup and performance standards have been attained;

5) Data Evaluation and Reporting: Discuss free product monitoring, groundwater sampling and analytical procedures, data validation, evaluation procedures, reporting, and monitoring schedules;

6) Criteria for Meeting Performance and Compliance Standards: Discuss criteria to be used to determine if performance and compliance standards have been met; and

7) Contingency Plans: Discuss the steps that will be implemented in the event the proposed cleanup actions are not effective.

1.1 SITE DESCRIPTION

The GATX Harbor Island Terminal is located at 2720 13th Avenue Southwest in Seattle, Washington and is part of a U.S. EPA Superfund Site, the Terminal Operable Unit. The facility, approximately 14 acres in size, is located in the highly industrialized north-central section of Harbor Island. The Terminal is situated on relatively level property, with surface elevations ranging between 6 to 11 feet above sea level. There are no surface water bodies within the Terminal property boundaries. The site is situated approximately 1,400 feet from the West Waterway and over 1,000 feet from the East Waterway. The site is zoned industrial and meets the industrial criteria established under WAC 173-340-745. It is likely that the site will remain an industrial facility in the foreseeable future because of the site zoning, and, perhaps more importantly, because of the substantial industrial improvements to Harbor Island (e.g., construction of cargo handling facilities and construction of major petroleum distribution pipelines for the island). Ecology and EPA have determined that there is no current or planned future use of groundwater beneath Harbor Island for drinking water purposes.

The Terminal is presently divided into five distinct areas. These areas include the A, B, C, D, and E Yards. The A Yard contains two fuel tanker truck-loading racks. The administrative office and maintenance building is also situated in the A Yard. The A Yard is entirely paved with asphalt or concrete. The A Yard is bounded by a containment dike for the B Yard on the north, and by chain-link fencing on the south, east, and west.

The B and C Yards are used as bulk fuel storage areas. Fifteen above ground storage tanks are located within the B Yard and six are situated within the C Yard. Both yards are mostly unpaved and are surrounded by concrete containment dikes. The D Yard is situated between the B and C Yards and has been used to route product and utility lines. Several maintenance buildings and material handling areas are also situated within the D Yard.

The Terminal is situated on the southeast portion of a groundwater mound which is centered on the northern half of Harbor Island. Groundwater flow migration is south and southeast across the site. The primary groundwater discharge point is the Duwamish River East and West Waterways. Due to the dampening effect of the bulkhead structures along the East and West Waterways of the Duwamish River, and the inland location of the site, water table fluctuations in response to tidal influence and seasonal fluctuations is less than one foot.

1.2 SELECTED CLEANUP ACTION SUMMARY

The selected cleanup action is designed to accomplish the following requirements: protect human health and the environment, comply with cleanup standards established in WAC 173-340-700, comply with applicable state and federal laws under WAC 173-340-710, provide compliance monitoring as set forth in WAC 173-340-410, use permanent solutions to the maximum extent practicable as mandated in WAC 173-340-360 (2), (3), (4), (5), (7), and (8), provide a reasonable time restoration in accordance with WAC 173-340-360 (6), and consider public concerns as designated in WAC 173-340-600.

Cleanup actions at the site include source removal in the soil and groundwater and recycling/off-site disposal, monitoring, natural attenuation, and institutional controls.

Soil. The goal of soil cleanup standards for petroleum hydrocarbons is to protect the beneficial use of groundwater (surface water quality and associated ecosystem). The preferred alternative will result in substantive compliance with the soil cleanup standards by reducing concentrations of contaminants in soils to levels that will support and maintain compliance with ground water quality standards.

The specific soil cleanup actions are:

- In-situ treatment of soil that includes soil vapor extraction (SVE),and natural attenuation/intrinsic biodegradation.
- Excavation of accessible total petroleum hydrocarbons (TPH) subsurface soil hot spots with concentrations above 10,000 milligrams per kilogram (mg/kg) to the extent practicable in the C Yard.
- Excavation of accessible TPH subsurface hot spots with concentrations above 20,000 mg/kg to the extent practicable in the A, B, and D Yards.
- In-situ treatment of inaccessible soil hot spots to the extent practicable in all Yards.
- Natural attenuation of the residual TPH in the subsurface soil.

- Excavation or capping of lead- and arsenic-impacted surface soil with concentrations above 1,000 mg/kg and 32.6 mg/kg, respectively, in the B and C Yards.

Groundwater. The achievement of cleanup levels in groundwater shall be measured at points of performance and compliance located within the product plume area and at the downgradient edge of the site. The wells at the downgradient edge of the site are considered conditional points of compliance wells. These points of compliance and performance shall consist of a network of monitoring wells located in the product plume area and on the downgradient property boundary. Other wells (sentry wells) situated off-site will also be used to document plume migration, performance standards, and to warn of any unanticipated change in off-site groundwater conditions. Exact locations of these wells are identified in the Section 2 of this plan.

The specific cleanup actions include:

- Active and passive free product recovery in the A, B, and C Yards,
- Dual-phase extraction of groundwater and product in the A and C Yards,
- Extraction of groundwater and/or free product,
- Active and passive point-source extraction in the A, B, and C Yards,
- Partially-penetrating down-gradient vertical barrier to stop product migration in the A and C Yards,
- Free product monitoring in the A, B, C, and D Yards,
- Groundwater monitoring in point of compliance (confirmation), performance and offsite (sentry) wells for the site, and
- Institutional control in the form of a deed restriction for the site.

1.3 Monitoring Objectives and Rationale

The cleanup action incorporates monitoring to determine that cleanup standards are achieved and maintained after remedial actions have been completed. During the remedial actions, performance monitoring will be conducted to confirm that cleanup actions have attained cleanup standards and treatment goals. After remedial actions are performed, performance monitoring will be conducted to confirm and document that cleanup actions have attained cleanup standards and performance standards. Protection monitoring will be used to adequately protect human health and the environment during construction and operation of the cleanup actions.

The achievement of cleanup levels in groundwater shall be measured at points of performance and compliance located within the free product plume area and at the downgradient edge of the site. The overall objective of the compliance monitoring wells downgradient of the free product plumes and on the property boundaries is to provide additional safeguards by providing both Ecology and GATX with early warning of potential contamination migration and basis for Contingency Plan reviews and implementation, if necessary. Sentry wells, situated off property limits and downgradient of dissolved petroleum hydrocarbon plumes, will also be used to monitor migration of dissolved petroleum constituents.

Monitoring methods, monitoring locations, and types of analyses were selected to monitor the effectiveness of the cleanup actions in attaining the soil, free product, and groundwater cleanup standards for the site. The specific details of these monitoring activities are described in subsequent sections of this document.

13.1 Soil

TPH, arsenic, and lead concentrations were above levels requiring action at the site.

The determination of adequate soil treatment will be based on the ability to comply with the groundwater cleanup standards for the site, to meet performance standards designed to minimize human health or environmental exposure to soils above cleanup levels, and to provide practicable treatment of contaminated soils.

Monitoring objectives are based on the following site observations:

1. **TPH in the A Yard.** Soil TPH concentrations were above the cleanup action levels (20,000 mg/kg) north, northwest and west of the Garage Building Area.

2. **TPH, Arsenic, and Lead in the B Yard.** Soil TPH concentrations were above the cleanup action levels (20,000 mg/kg) between Tanks 18 and 21, and southwest of Tank 22. Concentrations of arsenic and lead in surface soil were above the cleanup levels (32.6 and 1,000 mg/kg, respectively) in unpaved soil covering roughly half of the B Yard.

3. **TPH, Arsenic, and Lead in the C Yard.** Soil TPH concentrations were above the cleanup action levels (10,000 mg/kg) at seven locations in the C Yard as follows: i) MW-4, SS-17, SS-18, which is southeast of Tank 44, ii) SS-2, which is northwest of Tank 44, iii) S-6, which is northwest of Tank 37, iv) SS-2 and SS-13, which is between Tanks 42 and 39, v) S-5 and S-8, which is between Tanks 35 and 37, vi) S-10, which is north of Tank 35, and vii) S-12, which is southwest of Tank 35. Concentrations of arsenic and lead in surface soil were above the cleanup levels (32.6 and 1,000 mg/kg, respectively) in unpaved soil covering roughly half of the C Yard.

13.2 Groundwater

Groundwater will be monitored for benzene, toluene, ethylbenzene, TPH-G, TPH-D, TPH-O, free product, and lead in specific areas of the site

prior, during and after implementation of the cleanup action discussed in Section 1.2. The selected analysis and monitoring locations correspond to the soil cleanup areas identified in Section 1.3.1, areas of product recovery, and the water quality chemistry data for the site.

Wells Not Included in Compliance Monitoring Program. Monitoring wells not included in the confirmation, performance, or the sentry wells are excluded from this Compliance Groundwater Monitoring Program. After the one-year review of the site groundwater analytical data as discussed in Section 3.4.1, Ecology and GATX will review potential wells for abandonment as appropriate.

Damaged Wells Due To Cleanup Action Implementation. Monitoring wells designated for confirmation, performance or sentry wells that become disabled as a result of the cleanup action implementation must be replaced. Ecology must approve the new proposed location before replacement of the damaged groundwater monitoring well.

Areas Above Cleanup Levels

BTEX and TPH Areas. Shallow monitoring wells with periodic or consistent detection of BTEX constituents or TPH above the cleanup levels include, Well 24, T-10, T-17, T-11, MW-3, T-15, T-8, T-5, T-19, T-13, T-18, Well 17, MW-14, MW-7, Well 15, MW-9, A-27, A-28, A-26, A-24, A-3, A-21, A-23, A-15, and A-10. These wells are located in or around Yards A, B, C, and D and, due to historic detection of petroleum-hydrocarbon-related IHSs above cleanup levels (Table 2), these monitoring wells will be included in the compliance monitoring program. Monitoring in these wells will be focused on the IHSs for groundwater to provide water quality data for baseline data and trend analysis. Furthermore, a selection of these wells will be monitored for natural attenuation parameters (Table 3).

Lead Areas. Total lead was detected periodically above the cleanup level (0.0058 mg/l) in the following wells: MW-1, MW-2, MW-3, MW-5, MW-6, MW-7, MW-07, MW-8, MW-9, MW-11D, MW-12, MW-13, A-14, A-21, A-23, A-24, A-28, SF-01, SH-02, SH-04, and SH-05. Dissolved lead was detected periodically above the cleanup level (0.0058mg/l) in MW-7. These wells will be included in the compliance monitoring wells and analyzed for total and dissolved lead as part of the performance and confirmation monitoring of the surface cleanup action for the site as described in Section 1.2.

1.4 COMPLIANCE MONITORING CATEGORIES AND SCHEDULE

Groundwater compliance monitoring will consist of free product monitoring, groundwater elevation monitoring, and groundwater sampling.

- Free product monitoring will consist of measuring free product thickness in areas of the site as part of the performance standard evaluation after implementation of the preferred remedial alternative.

- Groundwater elevation monitoring will be performed during free product monitoring events and during groundwater sampling events.

- Groundwater samples will be collected from designated GATX compliance monitoring wells, performance monitoring wells, and sentry wells.

The monitoring objectives have been categorized as protection, confirmation, and performance monitoring. These three forms of compliance monitoring will be performed in accordance with WAC 173-340-410.

Protection Monitoring to confirm that human health and the environment are adequately protected during construction and the operation and maintenance period of the cleanup action.

Performance Monitoring to confirm that the cleanup action has attained cleanup standards and other performance standards.

Confirmation Monitoring (Confirmation and Sentry Wells) to confirm the long-term effectiveness of the cleanup action once cleanup actions and other performance standards have been attained.

Monitoring Schedule. Groundwater sampling will begin in the quarter that the Consent Decree is approved (December 1999) and will continue for five years (December 2004). Sampling will occur quarterly for the first year. Ecology and GATX will review the data after one year. If trends are declining, the sampling frequency and number of parameters may be reduced.

2.0 Compliance Monitoring

Compliance monitoring will begin within the quarter the Consent Decree is approved and will continue for five years. Figure 1 shows the locations of all wells in which product will be monitored, groundwater levels will be measured, and groundwater samples will be collected as part of the site compliance monitoring program. Table 1 provides a list of compliance monitoring wells, identifying the well location, monitoring objective, and well use. A summary of the analytical parameters to be used in compliance monitoring is presented in Tables 2 and 3. A detailed description of each compliance-monitoring component, including the media type, location, and schedule, is presented this section. Specific schedule details are discussed within Sections 2.2.3 and 2.3.3. and Table 1.

2.1 Protection Monitoring

The objective of protection monitoring is to confirm that human health and the environment are adequately protected during construction, operation and maintenance of the cleanup action [WAC 173-340-410(1)(a)]. Protection monitoring will be addressed in the health and safety plan prepared in conjunction with the engineering design report, construction plans and specifications, and operation and maintenance plan (WAC 173-340-400).

2.2 Performance Monitoring

The objective of performance monitoring is to confirm that the cleanup action has attained cleanup standards and other performance standards as appropriate [WAC 173-340-410(1)(b)]. Performance monitoring will consist of free product monitoring during product recovery activities and groundwater sampling to evaluate the effectiveness of soil and groundwater cleanup actions and natural attenuation.

2.2.1 Performance Monitoring Locations

Wells A-14, A-21, A-23, A-27, MW-3 through MW-9, MW-14, MW-07, SH-02, SH-05, and three new wells will be used for performance wells. These wells are located in or around Yards A, B, C, and D within groundwater plume. Due to historic detection of petroleum-hydrocarbon-related IHSs above cleanup levels, these monitoring wells will be included in the compliance monitoring program. Monitoring in these wells will be focused on the IHSs for groundwater to provide water quality data for baseline data

and trend analysis. These wells will also be monitored for natural attenuation parameters (Table 3).

Areas Below Cleanup Levels: IHSs were not detected above the groundwater cleanup levels (Table 2) more than once in shallow monitoring wells MW-1, MW-2, MW-5, MW-07, MW-8, MW-12, MW-13, MW-16, MW-17, MW-18, A-8, A-24, SH-02, SH-05, T-3, T-4, and T-12. Most of these wells are located at the downgradient sides of the C Yard and some are located in the A, B, and D Yards.

Free Product: Shallow wells located in or around a free product plume in the C Yard include Well 20, Well 21, Well 22, MW-4, Well 25 and Well 27. Shallow wells located in or around a free product plume within the A Yard, include, A-6, A-4, A-29, A-22, A-16, A-13, A-14, A-20 and A-19. A shallow well located in or around a free product plume within the B Yard is Well 12.

All monitoring wells where water level measurements are taken will be measured for free product. A measurable thickness of free product is defined as greater than or equal to 0.01 feet. There are presently 76 monitoring wells being used to develop groundwater elevation contours for the site.

A Yard: Shallow wells located in or around a free product plume at the A Yard with current free product detection include A-6, A-4, A-29, A-22, A-16, A-13, A-14, A-20 and A-19.

B Yard: Shallow well located in or around a free product plume at the B Yard with current free product detection is Well 12.

C Yard: Shallow wells located in or around a free product plume at the C Yard with historic and current free product detection include Well 20, Well 21, Well 22, MW-4, Well 25 and Well 27.

Product performance monitoring will be performed in these wells prior, during, and after implementation of the remedial action alternatives discussed in Section 1.2. The product performance standard is a "measurable product thickness", and the product cleanup standard is "no visible sheen." Sheen is defined as a visible display of iridescent colors on equipment or water removed from a monitoring well. After the performance standard has been met in these wells, they will be sampled for BTEX, TPH, (Table 2) and natural attenuation parameters (Table 3). Product shall be removed from the water table throughout the site, when ever present, to the extent technically feasible.

Dissolved TPH Constituents: Dissolved TPH constituents of TPH-G, -D, -O, and BTEX performance monitoring will be monitored in these wells prior, during and after implementation of the remedial action alternatives discussed in Section 1.2 for baseline data and trend analysis. Shallow monitoring wells with periodic or consistent detection of BTEX constituents or TPH above the cleanup levels include Wells 15, 17, 24, MW-3, MW-7, MW-9, MW-14, A-3, A-10, A-15, A-21, A-23, A-24, A-26, A-27, and A-28. These wells are located in or around Yards A, B, C, and D. Due to historic detection of petroleum-hydrocarbon-related IHSs above cleanup levels (Table 2), some of these monitoring wells will be included in the compliance monitoring program. Monitoring in these selected wells will be focused on the IHSs for groundwater to provide water quality data for baseline data and trend analysis. Additionally, these selected wells will be monitored for natural attenuation parameters (Table 3).

A Yard: Shallow well located adjacent to a free product plume at the A Yard with dissolved TPH constituents detected above cleanup standards (Table 2) include A-23 and A-28.

B Yard: Shallow well located adjacent to a free product plume at the B Yard with dissolved TPH constituents detected above cleanup standards (Table 2) is MW-7.

C Yard: Shallow wells located in or around a free product plume and soil TPH hot spots at the C Yard with dissolved TPH constituents detected above cleanup standards (Table 2) include MW-3, MW-4, Well 24, Well 25, T-5, T-18, and T-19.

D Yard: Shallow wells located adjacent to a free product plume and soil TPH hot spots at the D Yard with dissolved TPH constituents detected above cleanup standards (Table 2) include Wells MW-14, Well 17, T-13, T-15, and T-17.

Total and Dissolved Lead: Total lead was detected periodically above the cleanup level (Table 2) in Wells MW-6, MW-7, MW-07, MW-8, MW-9, MW-12, MW-13, A-21, A-23, A-24, A-28, SF-01, SH-02, SH-04, and SH-05. Dissolved lead was detected periodically above the cleanup level (Table 2) in MW-7. Performance monitoring will be performed in these wells, prior, during and after implementation of the remedial alternative discussed in Section 1.2 for total lead baseline data and trend analysis.

Off-site Sentry Monitoring wells: Wells A-23, A-28, MW-12, MW-13, MW-16, and MW-18 will serve as sentry wells. These wells will be included in the program due to their location adjacent to areas with soil cleanup

actions, free product plume or to provide off property boundary well network. Monitoring in these wells will be focused on the IHSs for groundwater to provide water quality data for baseline data and trend analysis.

Background wells: Wells MW-1 and MW-2 are located upgradient along a south/southeast groundwater flow direction for the site and will serve as the site background monitoring wells. These wells will be monitored for the IHSs for groundwater and natural attenuation parameters to establish baseline and background groundwater quality data. After one year, these wells will be monitored for the IHSs for groundwater only.

2.2.2 Performance Criteria

Separate-Phase Hydrocarbons: To monitor the effectiveness of the preferred remedial alternative discussed in Section 1.2 for free product, the performance criterion will be a lack of measurable product thickness in compliance monitoring wells.

Dissolved TPH Constituents and Lead: Groundwater cleanup levels (Table 2) are based on the protection of aquatic organisms and on human ingestion of such organisms. The Conditional Point of Compliance for the site groundwater is the property boundary.

Natural Attenuation: To demonstrate that natural attenuation is occurring to reduce contaminant concentrations, the performance criteria will be periodic monitoring of constituent plume data (i.e., BTEX and TPH) and a variety of other indicators of natural attenuation processes. These processes include physical, chemical, or biological processes in the form of biodegradation, dispersion, dilution, sorption, volatilization, and chemical or biological stabilization or destruction of contaminants. Following is the rationale for the selection of the natural attenuation monitoring parameters (from USEPA, 1994c).

Constituent Plume Characteristics

In the absence of natural attenuation mechanisms, constituent concentrations would remain relatively constant within the plume and then decrease rapidly at the edge of the plume. If natural attenuation is occurring, constituent concentrations will decrease with distance from the source along the flow path of the plume as a result of dispersion. If other natural attenuation mechanisms are occurring, the rate at which concentrations of constituents are reduced will be accelerated.

Monitoring of constituent concentrations in the groundwater over time will give the best indication of whether natural attenuation is occurring. If natural attenuation is occurring, the contaminant plume will migrate more slowly than expected based on the average groundwater velocity. Receding plumes typically occur when the

source has been eliminated. Natural attenuation may also be occurring in plumes that are expanding, but at a slower than expected rate. For example, in sandy soils [similar to Harbor Island] with relatively low organic carbon content (about 0.1 percent), BTEX constituents are expected to migrate at one-third to two-thirds of the average groundwater speed velocity (McAllister, 1994). Higher organic carbon content would further retard constituent migration. If constituents are migrating more slowly than expected based on groundwater flow rates and retardation factors, then other natural attenuation mechanisms (primarily biodegradation) are likely reducing constituent concentrations. For stable plumes, the rate at which contaminants are being added to the system at the source is equal to the rate of attenuation. A plume may be stable for a long period of time before it begins to recede, and in some cases, if the source is not eliminated, the plume may not recede.

Occurrence of biodegradation might also be deduced by comparison of the relative migration of individual constituents. The relative migration rates of BTEX constituents, based on the chemical properties, are expected to be in the following order:

benzene > toluene, o-xylene > ethylbenzene, m-xylene, p-xylene

If the actual migration rates do not follow this pattern, biodegradation may be responsible.

Dissolved Oxygen Indicators

The rate of biodegradation will depend, in part, on the supply of oxygen to the contaminated area. At levels of dissolved oxygen (D.O.) below 1 to 2 mg/L in the groundwater, aerobic biodegradation rates are very slow. If background D.O. levels (upgradient of the contaminant source) equal or exceed 1 to 2 mg/L, the flow of groundwater from the up-gradient source will supply D.O. to the contaminated area, and aerobic degradation is possible.

Where aerobic biodegradation is occurring, an inverse relationship between D.O. concentration and constituent concentrations can be expected (i.e., D.O. levels increase as constituent levels decrease). Thus, if D.O. is significantly below background within the plume, aerobic biodegradation is probably occurring at the perimeter of the plume.

Geochemical Indicators

Certain geochemical characteristics can also serve as indicators that natural attenuation, particularly biodegradation, is occurring. Aerobic biodegradation of petroleum products produces carbon dioxide and organic acids, both of which tend to cause a region of lower pH and increased alkalinity within the constituent plume.

Anaerobic biodegradation may result in different geochemical changes, such as increased pH. Under anaerobic conditions, biodegradation of aromatic hydrocarbons typically causes reduction of Fe^{3+} (insoluble) to Fe^{2+} (soluble), because iron is commonly used as an electron acceptor under anaerobic conditions. Thus, soluble iron concentrations in the groundwater tend to increase immediately downgradient of a petroleum source as the D.O. is depleted, and conditions change to be come anaerobic (i.e., reduced). The concentration of methane increases, another indication that anaerobic biodegradation is occurring.

Oxidation/Reduction Potential

The oxidation/reduction (redox) potential of groundwater is a measure of electron activity and is an indicator of the relative tendency of a solution to accept or transfer electrons. Because redox reactions in groundwater are biologically mediated, the rates of biodegradation both influence and depend on redox potential. Many biological processes operate only within a prescribed range of redox conditions. Redox potential also can be used as an indicator of certain geochemical activities (e.g., reduction of sulfate, nitrate, or iron). The redox potential of groundwater generally ranges from 800 millivolts to about -400 millivolts. The lower the redox potential, the more reducing and anaerobic the environment.

Measurement of redox potential of groundwater also allows for approximate delineation of the extent of the contaminant plume. Redox potential values taken from within the contaminant plume will be lower than background (upgradient) redox values and values from outside the plume. This is due in part to the anaerobic conditions that typically exist within the core of the dissolved hydrocarbon plume.

Methane. Methanogenesis has been determined to be a predominant biodegradation mechanism for fuel spills. During the aerobic biodegradation of petroleum constituents, methane is produced. Methane concentrations above background levels may indicate the occurrence of aerobic biodegradation of petroleum constituents.

Nitrate. After dissolved oxygen has been depleted, nitrate may be used as an electron acceptor for anaerobic biodegradation. Nitrate concentrations below background levels may indicate the occurrence of anaerobic biodegradation of petroleum compounds.

Sulfate. After dissolved oxygen and nitrate have been depleted, sulfate may be used as an electron acceptor for anaerobic biodegradation. Sulfate concentrations below background levels may indicate the occurrence of anaerobic biodegradation of petroleum compounds.

Based on this discussion (USEPA, 1994c), groundwater samples collected for natural attenuation evaluation will be analyzed for plume characterization parameters (BTEX, TPH-G, TPH-D, and TPH-O), dissolved oxygen, geochemical indicators (alkalinity, carbon dioxide, total iron (from which ferric iron [Fe^{3+}] can be calculated), ferrous iron (Fe^{2+}), hardness, methane, pH, and sulfate), and oxidation/reduction potential (Table 3).

2.2.3 Monitoring Schedule

Free product monitoring will be conducted at periodic intervals to allow product to accumulate in wells but no less frequently than once a month. The frequency of free product monitoring will also depend on the amount

and type of free product removed from the monitoring wells as well as the season and type of free product recovery activity.

Groundwater monitoring conducted to confirm the effectiveness of natural attenuation and to estimate the rate will be conducted quarterly for the first year and annually thereafter (Table 3). Natural attenuation monitoring will be performed in accordance with confirmation groundwater sampling described in Section 2.3.

2.3 CONFIRMATION MONITORING

The objective of confirmation monitoring is to confirm the long-term effectiveness of the cleanup action as discussed in Section 1.2, once performance and cleanup standards have been met [WAC 173-340-410(1)(c)]. Confirmation monitoring will include the sentry wells, and will consist of free product and groundwater monitoring for the IHS indicator parameters (Tables 2 and 3) as appropriate.

2.3.1 CONFIRMATION MONITORING LOCATIONS

All monitoring wells in which water level measurements are taken will be checked for free product. There are presently 76 monitoring wells being used to develop groundwater elevation contours for the site.

A total of 28 monitoring wells designated in Table 1 will be used as confirmation monitoring wells. These wells will be included in the program due to their location adjacent to areas with soil cleanup actions or to provide a property boundary well network. Monitoring in these wells will be focused on the IHSs (BTEX, TPH) to provide water quality data for baseline data and trend analysis. Some of these wells will also be monitored for natural attenuation parameters.

2.3.2 SENTRY-MONITORING WELLS

Wells A-23, A-28, MW-12, MW-13, MW-16, and MW-18 will serve as sentry wells. These wells will be included in the program due to their location adjacent to areas with soil cleanup actions, product plume, or to provide off property boundary well network. Monitoring in these wells will be focused on the IHSs (Table 2) for groundwater to provide water quality data for baseline data and trend analysis. Except for A-19, A-23, A-27, and A-28, the rest of these wells will not be monitored for natural attenuation parameters (Table 3) since cleanup levels have been already met in these wells.

Total and Dissolved Lead: Total lead was detected periodically above the cleanup level in the following wells MW-6, MW-7, MW-07, MW-8, MW-9, MW-12, MW-13, A-21, A-23, A-28, SH-02, and SH-05. Dissolved lead was detected periodically above the cleanup level (Table 2) in MW-7. Confirmation monitoring will be performed in these wells, prior, during, and after implementation of the remedial alternative discussed in Section 1.2 for total lead baseline data and trend analysis.

2.3.3 Compliance Criteria

Separate-Phase Hydrocarbons: To demonstrate that free product removal has been accomplished, the performance criterion will be a lack of sheen in compliance monitoring wells.

Groundwater: Cleanup levels are based on the protection of aquatic organisms and humans ingesting such organisms. The conditional point of compliance where these cleanup levels will be met is at the property boundary of the GATX site. The groundwater cleanup levels are presented in Table 2.

Groundwater compliance criteria will document that cleanup levels have been achieved. Groundwater analytical data will be evaluated using time-trend plots, data comparison to cleanup levels, and statistical analysis, if appropriate. Time-trend plots will be used to evaluate long-term analytical trends in relation to the associated cleanup levels. If statistical analysis is performed, the analysis will be conducted in accordance with WAC 173-340-720(8) and Ecology Guidance (1992, 1993, and 1995).

2.3.4 Monitoring Schedule

Confirmation free product monitoring will be conducted monthly for a period of one year after cessation of free product recovery activities as discussed in Section 1.2. The schedule will be reevaluated at that time as discussed in Section 3.4.1.

Monitoring of the confirmation, performance, and sentry groundwater monitoring wells will begin within the quarter the Consent Decree is approved. Confirmation monitoring will continue for five years after completion of the cleanup action. Sampling will occur quarterly for the first year. Ecology and GATX will review the data after one year. If monitoring data indicates that trends are declining, the sampling frequency and number of parameters may be reduced as warranted.

3.0 Data Evaluation

3.1 Data Validation

Analytical data will be validated according to United States Environmental Protection Agency (USEPA) data validation guidelines. Data validation will include evaluation of holding times, method blank results, surrogate recovery results, field and laboratory duplicate results, completeness, detection limits, laboratory control sample results, and chain-of-custody forms. Data validation procedures are further described in the Sampling and Analysis Plan (Appendix A).

3.2 Practical Quantitation Limits

Practical Quantitation Limits (PQLs) will be established for each analyte to determine whether any of the limits are above the corresponding cleanup level. The PQL will be determined by multiplying the lowest method detection limit (MDL) obtained by the laboratory for Terminal groundwater samples by a factor of ten (Ecology, 1993). If the PQL for any constituent is above the corresponding cleanup level, the cleanup level will be considered to be attained if the constituent is detected below the PQL [WAC 173-340-707(2)].

3.3 Product Monitoring Data

Product monitoring data will be reviewed as it is generated to determine the need for free product recovery system alterations or to determine changes in free product monitoring frequency. Quality control protocol will be followed to ensure that free product measurements are reliably obtained and consistently measured. Groundwater and product level data will be entered in spreadsheets for trend plots and analysis.

3.4 Groundwater Chemistry Data Review

Natural Attenuation Monitoring Data. Natural attenuation monitoring data will be reviewed to determine if the data is sufficient to evaluate natural attenuation processes at the site. If data gaps are identified, GATX may propose to add parameters as necessary to adequately evaluate natural attenuation.

Confirmation, Performance, and Sentry Monitoring Data. After each monitoring event, groundwater chemistry data will be reviewed once

it is validated. The data will be compared to groundwater cleanup levels. If a sample result is above a groundwater cleanup level and is also above the historic high concentration in that well, the well will be re-sampled to verify the result. Re-sampling will occur within one month of receiving the laboratory data. Groundwater chemistry and elevation data will be used in the one and five-year review as subsequently described.

3.4.1 One Year Site Review

Groundwater elevation and chemistry data will be evaluated after the first year of sampling. Natural attenuation monitoring well data will be evaluated as previously discussed in Section 2.2.2. Spatial and temporal changes in plume characterization parameters, dissolved oxygen, geochemical indicators, and oxidation/reduction potential (Table 3) will be evaluated to determine the effectiveness and rate of natural attenuation at the site.

Groundwater analytical results will be evaluated using time-trend plots and data comparison to cleanup levels. Time-trend plots will be prepared for each constituent detected above the PQL; trends will be identified by visual observation. The time-trend plots will be used to evaluate long-term trends in compliance wells and to compare groundwater conditions with cleanup levels. A groundwater contour map will be prepared to verify that the predominant groundwater flow directions at the Terminal remain relatively consistent.

The data evaluation will be submitted to Ecology for review. After the first year review, if the confirmation (and or sentry) wells exceed cleanup standards, Ecology and GATX (and the potentially affected adjacent property owner) will evaluate groundwater conditions prior to considering contingency plans. If monitoring data indicates that trends are declining, the sampling frequency and number of parameters may be reduced as warranted.

3.4.2 Five Year Site Review

Groundwater elevation and chemistry data will be evaluated after five years of monitoring. Groundwater contour maps will be prepared to verify that the groundwater flow directions at the Terminal have not changed significantly.

Natural Attenuation Monitoring Data. Natural attenuation monitoring data will be evaluated as previously described in Section 2.2.2.

The data evaluation will be documented and presented in the five-year review report.

Sentry Well Data: Groundwater analytical data will be evaluated using time-trend plots and data comparison to cleanup levels. Time-trend plots will be prepared for each constituent detected above the PQL and trends will be identified by visual observation.

Confirmation and Performance Well Data: Groundwater analytical data will be evaluated using time-trend plots, data comparison to cleanup levels, and, if appropriate, statistical analysis. Time-trend plots will be prepared for each constituent detected above the PQL and trends will be identified. Time-trend plots will be used to evaluate long-term analytical trends in relation to the associated cleanup levels. If statistical analysis is performed, the analysis will be conducted in accordance with WAC 173-340-720(8) and Ecology Guidance (1992, 1993, and 1995).

4.0 Compliance Evaluation Criteria

4.1 Performance Monitoring

Monitoring data will be evaluated to determine the effectiveness of the remedy, whether changes to the free product monitoring schedule and/or monitoring wells are warranted. Changes may be made in the frequency of free product monitoring to optimize free product removal or system efficiency. These changes may depend on the amount and type of free product removed from the monitoring wells, the season, and the type of free product recovery activity. Other changes in performance monitoring will be made as follows:

- Additional free product recovery activities and monitoring will be initiated immediately if free product is observed in wells that previously had not contained free product.

- An additional well or well point will be installed and monitored if free product is observed for the first time in a downgradient or cross-gradient well. The need for additional free product recovery activities will also be reviewed.

- Performance monitoring will continue as long as free product is observed in the area being monitored.

- Performance monitoring will end and confirmation monitoring will begin when free product has not been observed in any well in the area being monitored for a period of six months.

4.2 Confirmational Monitoring

4.2.1 Free Product

Free product confirmation monitoring will end and the area will be considered to be free of free product when no sheen is observed in any well in the area being monitored for a period of one year.

Free product recovery activities and performance monitoring will resume if measurable product is found in any well in an area being monitored.

4.2.2 GROUNDWATER

The review of groundwater quality data will be focused on evaluating groundwater quality trends and not on a single event or exceedance in a single well. Changes to the groundwater-monitoring program will be based on groundwater quality data review as described in Section 3.4.

Groundwater quality data will be tabulated and trend plots prepared as part of the one-year site review and five-year site review. If the chemistry results are all below cleanup levels for four consecutive quarters, then GATX will petition Ecology for site de-listing review and if Ecology concurs, the site shall be de-listed.

As part of the five-year site review, statistical analysis of the data will be performed if groundwater analytical results remain above cleanup levels. Alternatively, if the cleanup standards are met in 95 percent of the wells for four consecutive quarters, GATX will petition Ecology for site de-listing review and if Ecology concurs, the site shall be de-listed. In addition to reviewing chemistry data for the indicator hazardous substances (Table 2), natural attenuation parameters (Table 3) will also be evaluated to determine the effectiveness of natural attenuation at the site.

Data will be evaluated as described in Section 3.4.2. The contingency plan (summarized in Section 5.0) will be initiated if the five-year review identifies the following:

- There is an increasing trend in the groundwater quality data and the data trend exceeds the cleanup level in the performance, confirmation and sentry wells.

- An analyte is consistently above the cleanup level or statistically above the cleanup level with an increasing trend and with no evidence of natural attenuation.

5.0 Contingency Plan

A contingency plan sets forth a "backup" remediation technology in the event that a remedial technology within the Cleanup Plan fails or proves ineffective in a timely manner (five years after implementation of the preferred option discussed in Section 1.2). When evaluating the need to implement the contingency plan, all data will be evaluated as described in Section 3.4.2. A contingency plan will be initiated and implemented within 30 days of meeting any of the following criteria:

- If, after implementing the selective remedial action, the results of the groundwater monitoring program indicate elevated contaminant concentration over the specified restoration time frame of 5 years;
- If contaminants are newly identified in point of compliance wells located beyond the original plume boundary, indicating renewed contaminant migration; or
- If contaminant migration is not decreasing at a sufficient rate to ensure that the primary and secondary concerns identified for the site are being met.

The following actions will be initiated if the above criteria are triggered:

- Identification of the source(s) causing the criteria to be triggered. The highest priority in the compliance plan would be to identify and control the source. Accessible sources will be removed to the extent technically practicable without undermining the integrity of the adjacent above storage tanks, if present near the source area(s).
- Review Preferred Options Summary discussed in Section 1.2 and propose a supplemental remedy or combination of remedies, if needed, to prevent adverse impacts to offsite properties. (e.g., evaluation and potential expansion of the free product recovery system to ensure removal of free product from the water table if residual free product is identified beyond the capture zone of the system).

In the event that site conditions trigger a contingency plan implementation due to adverse impacts to offsite properties, Ecology, GATX, and the potential to be affected adjacent property owner will evaluate groundwater conditions prior to implementation of the contingency plan. In the event that site conditions trigger a contingency plan implementation other than considerations due to adverse impacts to offsite properties, Ecology and GATX will evaluate groundwater conditions prior to implementation of the contingency plan.

In the event that the contingency plan should be implemented, GATX will prepare a contingency work plan that contains engineering design criteria to address the remediation technology necessary to address the criteria triggering the contingency plan implementation. The contingency work plan will be approved by Ecology prior to its implementation.

6.0 Reporting

During the compliance-monitoring program, monitoring data will be submitted to Ecology on a periodic basis. Ecology will also be notified if new data indicates that a significant change in site conditions has occurred. Monitoring data and other information will be submitted in the following reports:

- **Quarterly Data Reports**. Laboratory analytical data reports will be submitted to Ecology after each round of monitoring has been completed.

- **Annual Monitoring Reports**. Monitoring reports will be prepared annually. The report will include a data validation memo, updated groundwater chemistry tables (including any well re-sampling results), and free product recovery data. Analytical time-trend plots will also be included in the reports. Analytical time-trends will be discussed when they are observed and other relevant data observations will be described. Any changes in the free product recovery system will also be discussed.

- **Five-year Review Report.** A report will be submitted to Ecology summarizing the five-year review of the compliance monitoring data. The report will include an updated groundwater elevation table, a representative groundwater contour map, time-trend plots for analytes detected above the PQL, and a comparison of the data to cleanup levels. Groundwater elevation and chemistry data will be evaluated. In addition to reviewing chemistry data relative to the indicator hazardous substances, natural attenuation parameters will also be evaluated to determine the effectiveness of natural attenuation and other cleanup action implementation at the site. As part of the five-year site review, statistical analysis of the data will be performed if analytical results remain above cleanup levels.

7.0 References

Ebasco. 1990. Final Phase I Remedial Investigation, Harbor Island Site, Seattle, Washington. Submitted to EPA, Region 10.

Ecology. 1991. The Model Toxics Control Act Cleanup Regulation, WAC Chapter 170-340. Washington State Dept. of Ecology, February.

Ecology. 1992. Statistical Guidance for Ecology Site Managers. Publication No. 92-54. August.

Ecology. 1993a. Statistical Guidance for Ecology Site Managers, Supplement S-6, Analyzing Site or Background Data with Below-detection Limit or Below PQL Values (Censored Data Sets). August.

Ecology. 1993b. Implementation Memo No. 3 (re: PQLs as Cleanup Standards) from S. Robb to interested Ecology staff. Ecology Publication 93-100. November 24.

Ecology. 1993. Groundwater Cleanup Standards for Harbor Island. Letter correspondence to Shell. April 20th.

Ecology. 1993. Soil and Groundwater Cleanup Levels for Harbor Island RI/FS. Letter correspondence to Shell. July 26th.

Ecology. 1995. Guidance on Sampling and Data Analysis Methods. Publication No. 94-49. January.

Hart Crowser. 1992. Final Background Summary Report, Shell Oil Company, Harbor Island Terminal, Seattle, Washington. Submitted to Ecology. August 6th.

Hart Crowser. 1992. Remedial Investigation Work Plan, Shell Oil Company, Harbor Island Terminal, Seattle, Washington. Submitted to Ecology. November 4th.

Galaster, R.W., and W.T. Laprade, 1991. Geology of Seattle, Washington, United States of America. Bull. Assoc. of Engineering Geologist, V. 28, No. 3.

Madakor, Nnamdi. 1997. Washington State Depart of Ecology, Toxics Cleanup Program. Analytical Fate and Transport Modeling, Harbor Island Tank Farms (ARCO, TEXACO, & GATX), "A decision making tool in the Cleanup Action Plan"

Pacific Environmental Group Inc. 1994. Remedial Investigation Report, Shell Oil Company, Harbor Island Terminal, Seattle Washington. Submitted to Ecology December 28th.

Pacific Environmental Group Inc. 1997. Focused Feasibility Study, GATX Terminals Corporation, Harbor Island Terminal, Seattle, Washington. Submitted to Ecology April 9th.

Pacific Environmental Group Inc. 1996. Supplemental Remedial Investigation, GATX Harbor Island Terminal, Seattle, Washington. Submitted to Ecology April 11th.

Pacific Environmental Group Inc. 1997. Supplemental Remedial Investigation, C Yard Fuel Spill, GATX Harbor Island Terminal, Seattle, Washington. Submitted to Ecology March 20th.

USEPA. 1993. Record of Decision; Declaration, Decision Summary, and Responsiveness Summary for Harbor Island Soil and Groundwater, Seattle, Washington. USEPA, Region 10. September 1994.

USEPA. 1994c. "Chapter IX, Natural Attenuation" in How to Evaluate Alternative Cleanup Technologies for Underground Storage Tank Sites, A Guide for Corrective Action Plan Reviewers. USEPA Office of Solid Waste and Emergency Response. EPA 510-B-94-003. October.

USEPA. 1995. A Guide for Corrective Action Plan Review, How to Evaluate Alternative Cleanup Technologies for Underground Storage Tank Site, 510-B-95-007. May.

USEPA. 1997. Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites, Draft Interim Final OSWER Directive 9200.4-17. USEPA Office of Solid Waste and Emergency Response. November.

Weston. 1993. Remedial Investigation Report; Remedial Investigation and Feasibility Study, Harbor Island. Prepared for USEPA, Region 10. February.

Table 1
Compliance Monitoring Wells
GATX Harbor Island Terminal
Seattle, Washington

Monitoring Well	Well Location	Compliance Monitoring Objective
A-5	A Yard	Confirmational
A-8	A Yard	Confirmational
A-10	A Yard	Confirmational
A-14	A Yard	Performance / Confirmational
A-21	A Yard	Performance / Confirmational
A-23	A Yard*	Performance / Confirmational / Sentry
MW-7	B Yard	Performance / Confirmational
MW-8	B Yard	Performance / Confirmational
MW-9	B Yard	Performance / Confirmational
MW-07	B Yard	Performance / Confirmational
A-27	B Yard	Performance / Confirmational
SH-05	B Yard	Performance / Confirmational
A-28	B Yard*	Confirmational / Sentry
New Well #2	B Yard	Confirmational
MW-2	C Yard	Background / Confirmational
MW-3	C Yard	Performance/ Confirmational
MW-4	C Yard	Performance / Confirmational
SH-02	C Yard	Performance / Confirmational
New Well #1	C Yard	Performance / Confirmational
New Well #4	C Yard	Performance / Confirmational
MW-12	D Yard*	Confirmational / Sentry
MW-13	C Yard*	Confirmational / Sentry
MW-16	C Yard*	Confirmational / Sentry
MW-18	C Yard*	Confirmational / Sentry
MW-5	D Yard	Performance / Confirmational
MW-6	D Yard	Performance / Confirmational
MW-14	D Yard	Performance
New Well #3	D Yard	Performance / Confirmational
MW-1	E Yard	Background / Confirmational

NOTES: All wells where water levels are measured serve as Performance or Confirmation wells for free product

* Located Off-site

Table 2
Groundwater Cleanup Levels
GATX Harbor Island Terminal
Seattle, Washington

Constituent	Cleanup Level (mg/L)
Benzene	0.071
Toluene	200.0
Ethylbenzene	29.0
TPH-G	1
TPH-D	10
TPH-O	10
Lead	0.0058

Table 3
Natural Attenuation Indicator Parameters
GATX Harbor Island Terminal
Seattle, Washington

PARAMETER	METHOD / UNIT
Temperature, pH, alkalinity	Field / variable
Dissolved Oxygen (DO)	Field / mg/l
Carbon dioxide	Field / mg/l
Nitrate (NO_3)	Laboratory / mg/l
Nitrite (NO_2)	Laboratory / mg/l
Dissolved ferrous iron (Fe^{2+})	Laboratory / mg/l
Dissolved Methane (CH_4)	Laboratory / mg/l
Sulfate (SO_4)	Laboratory / mg/l
Sulfide (H_2S)	Laboratory / mg/l
Reduction/Oxidation potential (Redox, Eh)	Field / millivolts